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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON GOLDSBY and

KAILI TUALAU,

Defendants.

Case No. 2:16-cr-294-JCM-VCF

**Stipulation to Extend Deadlines
Regarding Defendant Goldsby and
Tualau's Motions [ECF 258, 259]**

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney, through Richard Anthony Lopez, Assistant United States Attorney, Joshua Tomscheck, Esq., counsel for Defendant Jason Goldsby, and Richard E. Tanasi, Esq., counsel for Defendant Kaili Tualau, that (1) the Government's deadline to respond to Defendants' motions filed at ECF 258 and ECF 259, currently set for October 27 and 28, 2020, respectively, be extended to November 13, 2020; and (2) Defendants' deadline to file any reply be extended to November 20, 2020.

This stipulation is entered into for the following reasons:

1 1. On October 13, 2020, Defendant Goldsby filed a motion to suppress (at ECF
2 258). Under Local Criminal Rule 12-1(a)(2), the Government's response to this motion
3 would be due on or before October 27, 2020.

4 2. On October 14, 2020, Defendant Tualau filed a motion to release grand jury
5 testimony (at ECF 259). Under Local Criminal Rule 12-1(a)(2), the Government's response
6 to this motion would be due on or before October 28, 2020.

7 3. The parties request an extension of the briefing schedule so that the
8 Government has adequate time to respond to the motions filed by Defendants Goldsby and
9 Tualau.

10 4. This is the first request for an extension of time regarding the briefing
11 schedule on these motions.

12 5. Because trial is scheduled for February 8, 2021, the granting of this stipulation
13 will not affect the trial date.

14 6. Denial of this request for an extension could result in a miscarriage of justice.

15 DATED this 26th day of October, 2020.

16 Respectfully submitted,

17 NICHOLAS A. TRUTANICH
18 United States Attorney

19 /s/ Joshua Tomsheck, Esq.
JOSHUA TOMSHECK, ESQ.
Counsel for Defendant GOLDSBY

20 /s/ Richard Anthony Lopez
RICHARD ANTHONY LOPEZ
Assistant United States Attorney

21 /s/ Richard E. Tanasi, Esq.
RICHARD E. TANASI, ESQ.
Counsel for Defendant TUALAU

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:16-cr-294-JCM-VCF

Plaintiff,

v.

JASON GOLDSBY and

KAILI TUALAU,

Defendants.

[Proposed] Order Granting Stipulation to Extend Deadlines

Regarding Defendant Goldsby and Tualau's Motions

Based on the pending stipulation of the parties, and good cause appearing, the stipulation is hereby GRANTED.

IT IS HEREBY ORDERED that the deadline for the Government's response to Defendant Goldsby and Defendant Tualau's motions filed at ECF 258 and 259 be extended to November 13, 2020; and

IT IS FURTHER ORDERED that the deadline for any reply by Defendant Goldsby or Defendant Tualau be extended to November 20, 2020.

DATED this 26th day of October, 2020.



HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE